## UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTHERN OHIO EASTERN DIVISION

IN RE: : CASE NO. 18-61415

LEHMAN, BRIANNA : CHAPTER 7

:

: JUDGE KENDIG

Debtor(s) :

: MOTION FOR TURNOVER

Now comes the Chapter 7 Trustee, Anne Piero Silagy, and respectfully requests the Court to enter an order directing the Debtor to turnover any real estate commissions received since the bankruptcy filing for purchase agreements entered into prior to the bankruptcy filing. Upon information and belief, these commissions total \$8,962.17.

For cause, the Chapter 7 Trustee states that this is property of the estate.

WHEREFORE, the Chapter 7 Trustee, Anne Piero Silagy, respectfully requests the Court for an order directing the Debtor, Brianna Lehman, to turnover real estate commissions received since the bankruptcy filing in the total amount of \$8,962.17

Respectfully submitted,

/s/Anne Piero Silagy
ANNE PIERO SILAGY
Chapter 7 Trustee
1225 South Main Street, Suite 1
North Canton, Ohio 44720
Telephone: (330) 526-8221

Facsimile: (330) 526-8231

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#### NOTICE OF MOTION FOR TURNOVER

Anne Piero Silagy, Chapter 7 Trustee, has filed a Motion for Turnover Debtor's real estate commissions.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have on in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the request, then on or before **October 15**, **2018**, you or your lawyer must:

File with the court a written response to the motion, explaining your position, at:

U.S. Bankruptcy Court Ralph Regula Federal Building 401 McKinley Ave SW Canton, Ohio 44702

If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Anne Piero Silagy, Esq. 1225 South Main Street Suite 1 North Canton, Ohio 44720

And

# Office of the United States Trustee Howard M. Metzenbaum U.S. Court House 201 Superior Avenue Room 441 Cleveland, Ohio 44114

If you or your attorney do not take these steps, the court may decide that you do not oppose the motion and no hearing will be held.

Dated: October 1, 2018 /s/Anne Piero Silagy

Anne Piero Silagy 1225 South Main Street, Suite 1 North Canton, Ohio 44720 Telephone: (330) 526-8221 Facsimile: (330) 526-8231

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### **CERTIFICATE OF SERVICE**

I, Anne Piero Silagy, hereby certify that the foregoing Motion for Turnover and

Notice of Motion was sent by regular U.S. mail, postage prepaid, this 1st day of

October, 2018 to the following:

Brianna Lehman 2194 Poplar St. SE East Sparta, OH 44626

PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541

Toyota Lease Trust 14841 Dallas Parkway, Suite 425 Dallas, TX 75254

I, Anne Piero Silagy, hereby certify that the foregoing Motion for Turnover and Notice of Motion was electronically transmitted on or about October 1, 2018 via the Court's CM/ECF system to the following who are listed on the Court's Electric Mail Notice List:

- Anne Piero Silagy asilagycourt@neo.rr.com, asilagy@ecf.epiqsystems.com
- United States Trustee (Registered address)@usdoj.gov
- Giancarlo Variola capleavariola@yahoo.com

/s/Anne Piero Silagy Anne Piero Silagy